

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
Civil Division

Melvin March
4374 Eagle Court
Waldorf, MD 20603

Plaintiff

vs.

**Washington Metropolitan Area
Transit Authority**
600 5th Street, NW
Washington, DC 20001

Serve: Patricia Lee, General Counsel
600 5th Street, NW
Washington, DC 20001

and

Raneshia Shernette Allen
2649 Martin Luther King Avenue SE, #201
Washington, DC 20020

Defendants.

Civil Action No. _____

2019 APR 19 PM 1:28
CLERK OF THE
CIRCUIT COURT
PRINCE GEORGE MD #14

COMPLAINT

1. This Court has jurisdiction because the subject matter automobile collision occurred in Prince George's County, Maryland.
2. Plaintiff Melvin March (hereinafter "March") is an adult individual who resides in Waldorf, Maryland.
3. Defendant Washington Metropolitan Area Transit Authority (hereinafter "WMATA") is an organization which regularly conducts business in The State of Maryland and in Prince George's County.
4. Defendant Raneshia Shernette Allen (hereinafter "Allen") is an adult individual who resides in the District of Columbia.

5. On or about July 1, 2017 at approximately 5:00 p.m., Plaintiff was operating a motor vehicle which was stopped on Indian Head Hwy at or near the intersection with Old Ford Road due to a red traffic light signal.
6. At the aforementioned time and place, Defendant Allen was operating a vehicle owned by Defendant WMATA as their agent, servant and/or employee, with permission to use the vehicle, and was behind the Plaintiff's vehicle when Defendant Allen caused a collision by striking Plaintiff's vehicle when she prematurely moved the vehicle when the traffic light ahead turned green.
7. At that time and place, Defendant Allen had express and or implied permission to use the vehicle within the scope of her employment or as an agent, servant, joint venturer, or employee of Defendant WMATA.
8. Defendant Allen breached the duties of care owed to Plaintiff March.
9. As a direct and proximate result of the Defendant's negligence and breach of duties, Plaintiffs suffered bodily injuries, sustained pain and discomfort, incurred medical expenses, property damage and lost income.

COUNT I: NEGLIGENCE
(PLAINTIFF MARCH AGAINST DEFENDANT ALLEN)

10. Paragraphs 1-9 are hereby incorporated by reference and realleged as if fully restated herein.
11. Defendant Allen owed Plaintiff March numerous duties including, but not limited to the following: to maintain control of her vehicle, to yield right of way, to avoid a collision, to obey traffic signs and controls, to obey the rules of the road, to keep a proper lookout, to pay full-time and attention to her driving, to leave a proper

distance, to drive at a reasonable speed under the circumstances, to obey traffic control devices, and to not cause a collision.

12. Defendant Allen breached the duties owed to Plaintiff and caused the collision.
13. As a direct and proximate result of Defendant Allen's breach of duties, Plaintiff suffered bodily injuries, sustained pain and discomfort, incurred medical expenses, and lost income.

WHEREFORE, Plaintiff March demands judgment against Defendant Allen in and amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus interest and costs.

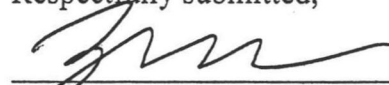
COUNT II: RESPONDEAT SUPERIOR/ VICARIOUS LIABILITY
(PLAINTIFF MARCH AGAINST DEFENDANT WMATA)

14. Paragraphs 1-13 are hereby incorporated by reference and realleged as if fully restated herein.
15. Defendant Allen was operating a vehicle owned by Defendant WMATA and with their permission and/or at their direction and/or as their agent, servant or employee.
16. At all times relevant herein, Defendant WMATA through its employee, agent and servant, Defendant Allen, was negligent in the operation of the Defendant's vehicle as set forth above.
17. As a direct and proximate result of the negligence of Defendant Allen, Defendant WMATA's employee, agent and servant, the collision occurred and Plaintiff sustained bodily injuries, sustained pain and discomfort, incurred medical expenses, and lost income.

18. Defendant WMATA is vicariously liable for the actions or omissions of Defendant Allen and/or liable under a doctrine of respondeat superior.

WHEREFORE, Plaintiff March demands judgment against Defendant WMATA in and amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus interest and costs.

Respectfully submitted,



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Attorney for Plaintiff